

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

IN RE:) BANKRUPTCY CASE
)
IRENE A. OSORIO SIMONENKO) NO.: 19-29854
)
Debtor,) CHAPTER 13
)
) JUDGE: JANET S. BAER

Hearing: October 01, 2021
Time: 9:30 a.m.

**RESPONSE TO DEBTOR'S MOTION TO SELL REAL
PROPERTY AND SHORTEN NOTICE**

Now Comes Lakeview Loan Servicing, LLC, by and through undersigned counsel, in response to Debtor's Motion to Sell Real Property and Shorten Notice stating as follows:

1. On October 21, 2019, the Debtor filed the instant bankruptcy petition under Chapter 13 of the Bankruptcy Code (11 U.S.C. Sec. 1301 et seq.)
2. The above captioned Chapter 13 was confirmed on January 17, 2020.
3. Lakeview Loan Servicing, LLC services the first mortgage lien on the real property located at 656 Fenwick Lane, South Elgin, IL 60177.
4. The confirmed plan provides that the Debtor will remit monthly mortgage payments directly to Lakeview Loan Servicing, LLC.
5. Debtor now seek the Court's authorization to sell the property located at 656 Fenwick Lane, South Elgin, IL 60177.
6. Debtor's Motion indicates they have a purchase offer in the amount of \$315,000.00 with an anticipated closing date of October 28, 2021.
7. Lakeview Loan Servicing, LLC is not opposed to Debtor's Motion to Sell the property

provided that the mortgage lien is paid in full pursuant to a contemporaneous payoff statement secured at the time of closing.

8. Any sale short of a full payoff will be subject to Lakeview Loan Servicing, LLC's final approval.
9. Additionally, given the tentative nature of real estate sales, Lakeview Loan Servicing, LLC seeks language in the Order stating that closing and receipt of funds will be within ninety (90) days from entry of the Order authorizing sale of the property located at 656 Fenwick Lane, South Elgin, IL 60177.

WHEREFORE, Lakeview Loan Servicing, LLC respectfully requests that this Court enter an Order permitting Debtor to sell the property subject to Lakeview Loan Servicing, LLC being paid in full, for closing and receipt of funds to be within 90 days, and for such other and further relief as the Court deems just and proper.

McCalla Raymer Leibert Pierce, LLC

By:

/s/Kinnera Bhoopal

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